

### **REMARKS**

Responsive to the office action mailed October 3, 2006 and the advisory action mailed January 5, 2007, Applicants provide the following. Claims 9 and 24-54 were previously canceled. Claims 1, 3, 6, 12, 17, 19, 21, 56 and 58-60 have been amended, and new claims 62-70 have been added. Therefore, thirty-eight (38) claims remain pending in the application: Claims 1-8, 10-23, and 55-70. Reconsideration of claims 1-8, 10-23, and 55-61 and consideration of claims 62-70 in view of the amendments above and remarks below is respectfully requested.

By way of this amendment, Applicants have made a diligent effort to place the claims in condition for allowance. However, should there remain any outstanding issues that require adverse action, it is respectfully requested that the Examiner telephone the undersigned at (858) 552-1311 so that such issues may be resolved as expeditiously as possible.

### **Claim Rejections – 35 U.S.C. §101**

1. Claims 56-61 stand rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter. Applicants respectfully traverse these rejections. Claim 56, however, has been amended to further recite “a medium that embodies a computer program for input to a computer; and a computer program stored on the medium comprising codes for causing the computer to perform steps.” Therefore, the claim has a functional relationship between the instructions and a computer that causing the computer to perform steps. Therefore, claim 56 meets all requirements of 35 U.S.C. 101. Further, as in MPEP 2106 “when a computer program is used in a computerized process where the computer executes the instructions set forth in the computer program” it is “statutory irrespective of the fact that a computer program is included in the claim.” Therefore, claim 56 is statutory under 35 U.S.C. 101 and Applications respectfully request the rejection be withdrawn.

**Claim Rejections - 35 U.S.C. §102**

2. Claims 1-3, 6, 8, 10-23 and 55-61 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,580,870 to Kanazawa et al. Applicants respectfully traverse these rejections in that the Kanazawa patent fails to teach all of the elements as recited in at least amended independent claims 1 and 17. For example, claim 1 recites in part:

- determining whether the media content is enhanced media content;
- identifying a first link to enhanced content when it is determined that the media content is enhanced media content;
- identifying a default link when it is determined that the media content is not enhanced media content;
- providing access over a network to one of the first link and the second link;

The Kanazawa patent fails to teach or suggest at least making a determination of whether the media content is enhanced media content and identifying a default link when it is determined that the media content is not enhanced media content. The Kanazawa patent only describes a DVD that includes “access information (link information) 30 is information (URL display related information)” as shown in FIG. 3 (Kanazawa, col. 5, lines 46-47). There is no discussion or suggestion in Kanazawa to make a determination of whether the content is enhanced media content. Still further, Kanazawa does not suggest a default link. The Kanazawa patent only describes DVDs that include URLs. There is no discussion of a default link. Further, Kanazawa fails to suggest a default link that is available when the media content is not enhanced media content. Therefore, claim 1 is not anticipated or obvious over the Kanazawa patent.

Claims 2-8, 10-16, 62- 66 and 68-70 depend from claim 1. Therefore, claims 2-8, 10-16, 62- 66 and 68-70 are also not anticipated by the Kanazawa patent.

Regarding at least claim 2, the Kanazawa patent fails to teach or suggest at least “accessing content recorded onto a recording medium by calling one of a plurality of directories, the directory being suitable for use with a platform of the client device.” The Kanazawa patent fails to teach or suggest at least directories or directories on the recoding

medium or that the directories are suitable for use with a platform of the client device. In response to Applicants prior arguments the pending advisory action suggests that Kanazawa describes “the DVD medium contains at least ‘video title set VTS’ directory or DVD video zone, and HTML directory or HTML zone” referring to Figure 18 of Kanazawa (advisory action, page 3, emphasis added). Applicants respectfully submit, however, that Kanazawa does not describe directories or directories suitable for use with a platform as claimed. Instead, Kanazawa only describes “zones.” There is no description in Kanazawa that these “zones” are directories. These zones cannot be equated to the directories as recited because there is no description in Kanazawa that these zones are directories as claimed. Figure 18 of Kanazawa simply shows the “volume space” of the medium and how that volume space is used for zones of content. There is no discussion or suggestion in Kanazawa that these zones are directories. Therefore, claim 2 is not anticipated by Kanazawa.

Further in supporting the rejection and in response to Applicants prior arguments the pending advisory action cites two additional U.S. Patents (specifically, U.S. Patent Nos. 6,308,005 and 6,360,057). This combination of references, however, cannot be used to support a rejection under 35 U.S.C. §102. Specifically, a rejection under 35 U.S.C. §102 can only be maintained if all the elements are taught by a single reference. Therefore, Applicants respectfully submit that the combination of the two additional references cannot be used as grounds for rejection, and instead at best a new rejection under 35 U.S.C. §103 should be issued.

Claim 3 is also not anticipated in that the Kanazawa patent does not teach each limitation as recited in amended claim 3. For example, amended claim 3 recites that “more than one of the plurality of directories include additional HTML content.” The Kanazawa patent, as demonstrated above, does not describe directories. Further, Kanazawa only describes a single HTM file “zone” to store HTML files. As such, even if, *arguendo*, the HTM file “zone” is equated to a directory, Kanazawa specifically teaches away from multiple zones having HTML content as the HTML files in Kanazawa

are maintained within a single “zone.” There is no suggestion or description of multiple directories containing HTML content in Kanazawa. Therefore, amended claim 3 is also not anticipated by Kanazawa.

Amended claim 6 is also not anticipated by Kanazawa. For example, claim 6 recites that “the plurality of directories each contains a set of platform specific code segments where each set is usable by at least a different one of a plurality of different client device platforms.” The Kanazawa patent does not describe a plurality of directories. Further, there is no suggestion in Kanazawa to include multiple directories that are usable by different client device platforms. Instead, Kanazawa teaches away from multiple directories in that Kanazawa groups the HTML files into a single HTML file “zone” (see at least Figure 18 of Kanazawa). Further, the Kanazawa patent fails to suggest sets of code segments, or code segments usable by different device platforms, or directories containing sets of platform specific code segments each usable by different ones of client device platforms. Therefore, the Kanazawa patent does not teach each limitation as recited in claim 6, and thus, amended claim 6 is not anticipated by Kanazawa.

Further, in maintaining the rejection of claim 6, the pending advisory action suggests that the zone contains the “VMG, VTS#1, VTS#2...VTS#n” and the HTML “zone” contain “ID and URL” citing Figure 18 of Kanazawa. However, Figure 18 of Kanazawa does not show code segments for different platforms, and there is no suggestion in Kanazawa that the VMG and the VTSs are usable by different client device platforms. Still further, there is no suggestion in Kanazawa to include a plurality of sets of platform specific code segments, with each set being usable by different client device platforms. Therefore, Kanazawa does not teach each limitation as recited in at least amended claim 6.

Claim 8 is also rejected as anticipated by Kanazawa. Claim 8, however, depends from amended claim 3, and Applicants demonstrated above that claim 3 is not anticipated by Kanazawa. Further, Kanazawa does not teach at least a portable storage

medium that includes a plurality of directories with more than one of the directories including HTML content. As demonstrated above, Kanazawa teaches away from such an implementation in that it limits the HTML files to a single “zone.” Therefore, Applicants respectfully submit that claim 8 is not anticipated by the Kanazawa patent.

Applicants further respectfully submit that amended claim 12 is also not anticipated by Kanazawa. Claim 12 recites “the HTML content is in the form of textual script, which scrolls in synchronization with the playback of the media content.” The Kanazawa patent does not teach or suggest at least textual script that synchronously scrolls with the playback of media content. In maintaining the rejection and in response to Applicants’ prior arguments the pending advisory action states that “figures 18-19 [show] a display screen that links the DVD video content with the HTML content ... DVD video content includes a car, the HTML content contains information about that car” citing col. 15, lines 32-45 and 57-61 (advisory action, page 4). However, nowhere does Kanazawa suggest that the HTML content synchronously scrolls with the playback of the content. Kanazawa may show textual information, and further, *arguendo*, that textual information may be about the “car” shown, but Kanazawa does not teach or suggest that this information scrolls. Further, Kanazawa does not suggest that the textual information scrolls in synchronization with the playback of the content. Claim 12 does not simply recite “link[ing] DVD video with the HTML contents” (Kanazawa, col. 15, lines 32-33), but instead recites textual script that synchronously scrolls with the playback of the content. The Kanazawa patent does not teach or suggest at least synchronously scrolling text with the playback of the media content. Therefore, amended claim 12 is not anticipated in view of Kanazawa.

Further in describing Figures 19A-B and the process of Figure 20 associated with Figures 19A-B the Kanazawa patent describes “[i]f an Internet address (URL) is included, the DVD playback control program 116 will store the position and state of the DVD video presently being reproduced and go into the pause (or halt) state (steps S104, S105)” (Kanazawa, col. 16, lines 25-28, *emphasis added*). Thus, the

Kanazawa patent does not teach or suggest at least that textual HTML content synchronously scrolls with the playback of the media content, and instead teaches away from scrolling in synchronization with the playback of the media content because Kanazawa specifically halts the playback of the media content while the HTML content is displayed. To suggest that Kanazawa scrolls the HTML content in synchronization with the playback of the media content would result in the HTML content not scrolling because the media content is halted. Therefore, the Kanazawa patent fails to teach each limitation as recited in at least amended claim 12, and thus, claim 12 is not anticipated by the Kanazawa patent.

Claim 13 is also not anticipated by the Kanazawa patent, and instead, the Kanazawa patent teaches away from the synchronous scrolling as well as the navigating within the media content in response to a selection in the HTML content. Specifically, claim 13 recites “the HTML content scrolls synchronously with the media content and wherein selecting a portion of the HTML content navigates the user to a corresponding location in the media content.” As demonstrated above, the Kanazawa patent does not describe synchronously scrolling HTML content with the media content.

Further, the Kanazawa patent does not teach or suggest at least the selection within HTML content that navigates a user to a corresponding location within the media content. The prior office action cites column 15, lines 34-64, column 20, lines 20-23, and column 11 lines 48-55 and 25-39. Lines 34-65 of column 15 of the Kanazawa patent, however, only describes that the HTML and DVD playback are “displayed simultaneously” (col. 15, lines 36-37) or that in response to a user selecting to access HTML content the playback is suspended S105 and then HTML content is retrieved to be displayed in a separate window (see FIG. 20) “interlocking” HTML content on the display. There is no suggestion or discussion that selecting a portion of the HTML content navigates a user to a corresponding location in the media content as claimed. Further, the “interlocking” described in the Kanazawa patent is only described as displaying the HTML content while the halted media content is still displayed. There

is no discussion that the “interlocking” allows a user to select a portion of the HTML content that will navigate a user to a corresponding location in the media content.

In response to Applicants’ arguments in maintaining the rejections, the pending advisory action repeatedly stresses how the “navigation manager takes URLs for referring to the locations of the HTML content ... corresponding to the scene being reproduced” (advisory action, page 4 emphasis added). The pending advisory action continues stating that “URLs [refer] to the locations of HTML content” (advisory action, page 4 emphasis added). However, the advisory action and the final office action fail to show where a selection in the HTML content will cause a navigation to a location within the media content. Instead, in conclusion to the arguments the advisory action states “[t]hat is, in response to a user’s instruction, the navigation manager takes URLs for referring to locations of the HTML contents related to the moving pictures presently being reproduced from the DVD medium” (advisory action, page 4, emphasis added). The advisory action cites col. 11, lines 30-61. However, col. 11, lines 30-61 only describes that “when a user has given an instruction to display HTML contents, the navigation manger 201 takes the URL referring to the location of the HTML contents related to the moving picture ... the WWW browser 117 acquires the HTML contents specified by the URL ...” (emphasis added). This only describes acquiring HTML content. There is no teaching or suggestion that the selection of HTML content causes a navigation within the moving picture.

The pending advisory action further cites col. 16, lines 10-12 of Kanazawa. However, Kanazawa in this cited portion again only describes acquiring HTML content. Specifically, Kanazawa states:

a method of giving a URL to a video object complying with the DVD video standard and a reproducing method in connection with the method will be explained ... embedding a URL in the reserve area for the PCI or DSI makes it possible to specify the Internet address to which the stream is related during the playback. The following is an explanation of playback when the data is embedded ... When the Web button is pressed during the playback of the DVD video, the related HTML contents are displayed ... If an Internet

address (URL) is included ... the DVD playback control program 116 will ... start the WWW browser 117 ... to be displayed on the WWW browser 117.... (Kanazawa, col. 15, line 65 – col. 16, line 33, emphasis added).

Therefore, it is clear that Kanazawa only describes acquiring HTML content when a URL is selected. There is no discussion in Kanazawa that teaches or suggests at least navigating within media content in response to a selection of a portion of the HTML content.

Applicants respectfully submit that the advisory action and final office action have failed to show where the selection of HTML content will cause a navigation to a corresponding location in the media content. Instead, the advisory action has only demonstrated that Kanazawa describes accessing HTML content. Simply because Kanazawa provides access to HTML content cannot be grounds to suggest that a selection within HTML content causes a navigation within the media content.

The Kanazawa patent only describes selecting an HTML link that causes a halt in playback of the content and displays HTML content. There is no suggestion or teaching that a selection of a portion of the HTML content causes navigation within the media content. Kanazawa may relate URLs with external HTML content, but Kanazawa does not teach or suggest at least that a selection of the HTML content causes navigation within the media content. Therefore, claim 13 is not anticipated by the Kanazawa patent.

Claim 14 is also not anticipated by the Kanazawa patent. For example, claim 14 recites that HTML content includes “an HTML page that starts a movie and checks for related internet sites.” The Kanazawa patent does not teach or suggest at least an HTML page that starts a movie, and further fails to suggest HTML content that checks for related internet sites. Instead, the Kanazawa patent describes accessing HTML content upon user activation (e.g., “only when the user selects the Web button” (col. 15, line 52)). Further, in maintaining the rejection and in response to Applicants prior arguments, the present advisory action again shows that Kanazawa describes URLs that link to HTML content stating “[a]s stated above, the navigation manager takes URLs for



referring to locations of the HTML contents related to the moving pictures...” (advisory action, page 5, emphasis added). However, the advisory action and final office action fail to show how this linking to HTML contents from the URL shows “an HTML page that starts are movie” or an HTML page that “checks for related Internet sites” as recited in claim 14. Instead, the pending advisory action only demonstrates that Kanazawa acquires HTML content in response to user interaction. The advisory action and the final office action fail to show where Kanazawa describes an HTML page that both starts a movie and checks for related Internet sites as claimed. HTML content according to Kanazawa are only accessed in response to user interaction. There is no discussion or suggestion that HTML content checks for related internet sites or starts a movie.

Further, in rejecting claim 14 the advisory action cites column 11, lines 48-61 and column 15, lines 50-60 of Kanazawa. Column 11, lines 48-61 of the Kanazawa patent, however, states “when the user has given an instruction to display HTML contents ...browser 117 acquires the HTML contents specified by the URL and displays it together with the moving picture on the screen.” There is no discussion or suggestion that HTML content starts a movie, or HTML content that checks for related internet sites. Instead, only after a user selects a URL does the browser search for that URL to retrieve the associated HTML content. Similarly column 15, lines 50-60 describes that only after the user selects to access Internet content does the system use the URL to acquire HTML content. There is no discussion that the HTML content starts a movie or that the HTML content searches for related internet sites. One cannot equate the acquiring of HTML content based on a URL to “starting a movie” as claimed, or to “checks for related Internet sites” as claimed. Nowhere does Kanazawa suggest accessing an HTML page and searching for additional related Internet sites. Thus, the Kanazawa patent fails to teach each limitation as recited in claim 14, and claim 14 is not anticipated by the Kanazawa patent.

Amended independent claim 17 is also not anticipated by the Kanazawa patent. As demonstrated above, the Kanazawa patent fails to teach or suggest at least “the HTML content is in the form of textual content that scrolls in synchronization with the multimedia content as the media content is accessed” as recited in claim 17. Therefore, claim 17 is also not anticipated by Kanazawa.

Claims 18-23, 55 and 67 depend from claim 17. Therefore, claims 18-23 and 67 are also not anticipated by the Kanazawa patent due at least to their dependency on allowable claim 17.

Amended claim 19 is also not anticipated by Kanazawa. For example, Kanazawa fails to teach or suggest at least:

determining whether the DVD includes an initial HTML content; and  
initially accessing a local default home page when the DVD does not contain the initial HTML content, where the HTML content local default home page is stored locally on the client device and not available through the DVD, and the local default home page is used to implement the retrieving of the HTML content from the network

There is no discussion in Kanazawa to determine whether the DVD includes an initial HTML content. Further, there is no suggestion or teaching of accessing a local default home page when the DVD does not contain the initial HTML content. Instead, Kanazawa only describes accessing HTML content identified in the URLs supplied on the DVD. Specifically, Kanazawa describes that “[o]n the DVD 40 in the DVD drive 4 ... AV information ... 40a and an information management table 40b are stored ... the information management table 40b is composed of and access information (or link information) 30” (col. 4, line 65 – col. 5, line 17) and continues to state that “[t]he access information (link information) 30 is information (URL display related information) to connect to resources (Web servers) for accessing a Web page” (col. 5, lines 46-48). There is no discussion or suggestion of a local default home page, or a local default home page that is stored locally on the client device. Still further, there is no discussion in Kanazawa that the local default home page is used to implement the retrieving of the

HTML content from the network. Therefore, the Kanazawa patent does not teach all of the limitations as recited in claim 19, and thus, claim 19 is in condition for allowance.

Claim 21 recites claim language similar to that of claim 13. Therefore, claim 21 is also not anticipated by the Kanazawa patent due at least to those arguments presented above with respect to claim 13.

Applicants further respectfully submit that amended claim 59 is also not anticipated by the Kanazawa patent. For example, claim 59 includes language similar to that of claim 6. Therefore, claim 59 is also not anticipated by the Kanazawa patent for at least those reasons provided above with respect to at least claim 6. Further, claim 59 recites in part “a general purpose platform that contains a set of general purpose executable codes that is usable by one or more additional client device platforms in addition to the plurality of different client device platforms.” The Kanazawa patent fails to teach or suggest at least a plurality of platform specific executable codes and further fails to teach a general purpose directory or general a set of purpose executable codes that is usable by additional client device platforms. Therefore, claim 59 is not anticipated or obvious over Kanazawa.

### **New Claims**

3. New claims 62-70 have been added without adding new matter. Support can be found throughout the application as filed for claims 62-70. For example, support for claim 62 can be found at least on page 19, line 22 – page 20, line 9; support for claims 63-64 can be found at least on page 22, line 22 – page 20, line 9 and page 29, lines 20-31; support for claims 65 and 67 can be found at least on page 19, line 22 – page 20, line 9; support for claim 66 can be found at least on page 20, lines 3-9; support for claim 68 can be found at least on page 27, lines 7-20; and support for claims 69-70 can be found at least on page 19, lines 5-18.

Applicants respectfully submit that claims 62-70 are not anticipated in view of Kanazawa. Claims 62-66 and 68-70 depend from claim 1, and claim 67 depends

from claim 17. Therefore, claims 62-70 are also not anticipated due at least to their dependency on allowable base claims.

Additionally, claim 62 is also not anticipated by the Kanazawa patent in that Kanazawa fails to teach at least “predefined enhanced content [that] operates as a container internet page during standard playback of the media content and enables event handlers to be loaded and activated to handle events during playback.” There is no suggestion or teaching in Kanazawa regarding predefined enhanced content that both operates as a container internet page during playback, or that enables event handlers during playback. Therefore, claim 62 is not anticipated by Kanazawa.

Claim 63 is also not anticipated by Kanazawa in that Kanazawa fails to teach at least a default link that is accessed when the content is not enhanced content such that the “default link is retrieved from memory of the client device and not accessible from the media content and not available from a medium storing the media content” as recited in claim 63. There is no suggestion of a default link in Kanazawa. Further, there is no suggestion that the default link is retrieved from the client device memory. Therefore, claim 63 is also not anticipated by Kanazawa.

Further, claim 64 depends from claim 63 and thus is not anticipated due at least to its dependency. Additionally, the Kanazawa fails to teach or suggest at least identifying the media content; and supplying the identification of the media content to an enhanced content source ... [to] identify the HTML content that is associated with the identification of the media content” as recited in claim 64. There is no discussion of identifying the media content and supplying the identity of the content to a source to obtain enhanced content based on the identity of the media content. Therefore, claim 64 is not anticipated by Kanazawa.

Claim 65 is also not anticipated by the Kanazawa patent. Applicants respectfully submit that nowhere does the Kanazawa patent teach or suggest at least “an initial enhanced content page that starts playback of the media content” as recited in claim 65. There is no discussion of an initial page that starts the playback of the media content.

Instead, the Kanazawa patent describes accessing HTML content only upon user activation (e.g., “only when the user selects the Web button” (col. 15, line 52)).

Therefore, claim 65 is not anticipated over Kanazawa.

Additionally, claim 66 is not anticipated by Kanazawa. For example, Kanazawa fails to teach at least “HTML content comprises a media content menu that provides navigate through the media content at a finer granularity than chapters within the media content” as recited in claim 66. Applicants respectfully submit that there is no discussion in Kanazawa regarding HTML comprising a media content menu, and further fails to suggest that the media content menu provides navigation at finer granularity than chapters within the media content. Therefore, claim 66 is not anticipated or obvious in view of Kanazawa.

Claim 67 depends from claim 17 and recites that “the retrieving HTML content from a network and the integrating the HTML content with the multimedia content comprises activating the retrieving and the integrating of the HTML content without user interaction.” The Kanazawa patent fails to teach retrieving and integrating HTML content without user interaction. Instead, the Kanazawa patent requires user interaction to access HTML content (e.g., “only when the user selects the Web button” (col. 15, line 52)). Therefore, claim 67 is not anticipated by Kanazawa.

Claim 68 is also not anticipated by Kanazawa. For example, claim 68 recites “the set of platform specific code segments comprise platform specific executable codes that override a standard network browser.” Applicants respectfully submit that there is no teaching or suggestion in Kanazawa to provide platform specific executable codes that override a standard network browser. Therefore, claim 68 is also not anticipated, and is in condition for allowance.

Claim 69 depends from claim 13 and further provides that the “HTML content comprises textual representations of at least a portion of the media content such that a selection of a textual representation of a corresponding scene in the HTML content causes the client device to playback the corresponding scene in the media content.” The

Kanazawa patent does not teach at least a textual representation of the media content. Instead, the Kanazawa only describes textual information (e.g., see Figure 19b), and fails to describe textual representation of the scene of the media content. Further, Kanazawa fails to describe playing back a scene in response to a selection of the textual representation of the media content. Therefore, claim 69 is not anticipated by Kanazawa.


Claim 70 depends from claim 69 and thus, is also not anticipated by Kanazawa. Further, Kanazawa fails to teach at least that the "textual representation of the portion of the media content comprises a screenplay of the portion of the media content." There is no suggestion or teaching of a screen play according to Kanazawa. Therefore, Applicants respectfully submit that claim 70 is not anticipated by Kanazawa.

### CONCLUSION

Applicants submit that the above amendments and remarks demonstrate that the pending claims are not anticipated by the applied reference. Therefore, Applicants request the rejections be withdrawn.

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